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UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

In re TRUONG, HAI & LIENG K. Debtors.	Chapter 7 Case No. 12-55682

DECLARATION

I, Marc Del Piero hereby declare:

I am the duly appointed Trustee of the above referenced bankruptcy estate (Trustee).

1) The information given herein is based on my personal knowledge and as such, if called as a witness, I would and could testify competently hereto.
2) I served as the Chapter 7 Trustee for the above referenced "asset case". The case and its assets were fully administered and closed in 2014.
3) On April 11, 2016, I was contacted by Attorney James Lee Hand and advised that he had been engaged by Hai Truong to pursue a suit in the Superior Court of California (Santa Clara County) to recover cash assets. The causes of action that Attorney Hand was engaged to pursue for Plaintiff Hai Truong were based upon the defendant's alleged breach of a contract to develop and sell commercial real estate in 2006-2011 and pursuit of recovery of cash assets against " alter egos". (see attached First Amended Complaint). These "assets" were not disclosed by the Debtor Truong during the MOC or on the bankruptcy petition.

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4) Pursuant to my discussion with Attorney Hand, I have concluded that the causes of action, and any recovery that may be resultant therefrom, are previously undisclosed assets of the bankrupt estate.

5) Based upon the evidence and information that I have received, I believe that it is appropriate for the Office of the United States Trustee to re-open Case # 12-55682 (Truong, Hai) so that the previously undisclosed assets of the estate can be pursued, recovered, and administered. Pursuant to the evidence that I have received, I hereby recommend that the subject case be re-opened by the Office of the United State Trustee.

6) See Exhibit A: First Amended Complaint.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

April 13, 2016

/s/ Marc Del Piero

San Jose #1290 MDP

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